

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA

v.

ANDREW URBANO PEREZ,  
Defendant.

Criminal No.1:24-MJ-097 PAS

ASSENTED MOTION TO CONTINUE AND  
TO EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT

The United States Attorney for the District of Rhode Island, through undersigned counsel, moves the Court to continue the time for bringing an information or indictment for a period of 60 days from the operation of the time limit imposed by the Speedy Trial Act. Defendant's counsel does not object to this motion. In support of this motion, the United States represents that counsel for the United States and the defendant are engaged in pre-Indictment negotiations. Additional time will allow the parties to possibly resolve the matter pre-Indictment which may also render trial in this matter unnecessary, thus potentially conserving judicial resources.

Accordingly, the United States respectfully requests that the case be continued for 60 days from January 15, 2025 to March 16, 2025 and that this time period be excluded in computing time under the Speedy Trial Act.

Based on the above, the United States avers that pursuant to 18 U.S.C. § 3161(h), the ends of justice served by granting the continuance outweigh the interests of the public and the defendant in a speedy trial.

Respectfully submitted,

UNITED STATES OF AMERICA

By its Attorney,

ZACHARY A. CUNHA

United States Attorney

/s/Peter Roklan

PETER ROKLAN

Assistant U.S. Attorney

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Providence, RI 02903

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CERTIFICATION OF SERVICE

On this 13<sup>th</sup> day of January, 2025, I caused the within Assented Motion to Continue and to Exclude Time Under the Speedy Trial Act to be filed electronically and it is available for viewing and downloading from the ECF system.

/s/Peter Roklan  
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